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5 Counsel for Defendant  
ESTER ENRIQUEZ  
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7

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,	)	No. CR 08-00258 RS
	)	
12 Plaintiff,	)	<b>DECLARATION OF LARA VINNARD</b>
	)	<b>IN SUPPORT OF EX PARTE</b>
13 v.	)	<b>APPLICATION FOR TRAVEL ORDER</b>
	)	
14 ESTER ENRIQUEZ,	)	
	)	
15 Defendant.	)	<b>Hon. Patricia V. Trumbull</b>
	)	

16 \_\_\_\_\_

17 I, Lara Vinnard, hereby declare:

- 18 1. I am an Assistant Federal Public Defender, and I have been appointed to represent Ester  
19 Enriquez in the above-captioned case.
- 20 2. Mrs. Enriquez is charged with destruction of mail. The government has recommended  
21 that she participate in the Pretrial Services Diversion program, and she is currently being  
22 evaluated by Pretrial Services to determine her suitability for diversion.
- 23 3. Mrs. Enriquez is out of custody. The Honorable Patricia V. Trumbull set conditions of  
24 release in this matter, including O.R. release and a travel restriction to the Northern  
25 District of California. She was not ordered to report to Pretrial Services for supervision,  
26 although she has been interviewed by Pretrial Officer Amy Berthelsen in connection with

1 her referral to the diversion program.

2 4. Mrs. Enriquez would like to travel with her husband and friends to Sonora, California,  
3 during the weekend of July 25 through 27. She intends to stay at the Best Western  
4 Sonora Oaks Hotel. The address of the hotel is 19551 Hess Avenue, Sonora, CA 95370.  
5 The telephone number is (800) 532-1944.

6 5. The travel is part of an organized excursion called the "Casino Run," which is organized  
7 on a yearly basis by a group of motorcycle and car enthusiasts in the Salinas area, where  
8 Ms. Enriquez resides. Mrs. Enriquez has provided me with a printed itinerary prepared  
9 by the group, which indicates that the group will travel from Salinas to Sonora on Friday,  
10 July 25, making several stops along the way, and will travel back to Salinas on Sunday,  
11 July 27, making several stops along the way. On Friday evening, the group will travel to  
12 the Black Oak Casino to participate in gambling or bowling. On Saturday, the group will  
13 travel to points of interest in the Sonora area, including Columbia State Park, Ironstone  
14 Winery, and Bear Valley Mountain Resort.

15 6. I provided Pretrial Services Officer Amy Berthelsen with information regarding Mrs.  
16 Enriquez's travel plans. Ms. Berthelsen indicated to me that because Mrs. Enriquez is not  
17 supervised by their office, Pretrial Services is not taking a position regarding the travel  
18 plans.

19 7. I also spoke with U.S. Attorney Law Clerk Elisabeth Oppenheimer, and summarized Mrs.  
20 Enriquez's travel plans. Ms. Oppenheimer had no objection.

21 I declare under penalty of perjury that the foregoing is true and correct, except for those  
22 matters stated on information and belief, and as to those matters, I believe them to be true.

23 Executed this 17<sup>th</sup> day of July, 2008, in San Jose, California.

24  
25 /s/  
LARA VINNARD  
26 Assistant Federal Public Defender